

1 ALINA M. SHELL, ESQ.
2 Nevada Bar No. 11711
3 JEFFREY F. BARR, ESQ.
4 Nevada Bar No. 7269
5 ARMSTRONG TEASDALE LLP
6 7160 Rafael Rivera Way, Suite 320
7 Las Vegas, Nevada 89113
8 Telephone: 702.678.5070
9 Facsimile: 702.878.9995
10 ashell@atllp.com
11 Jbarr@atllp.com

12 *Attorneys for Plaintiff*

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NATHAN WILLIAMS

Plaintiffs,

vs.

SGT. ALLEN et al.,

Defendants.

Case No.: 2:17-CV-01612-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
SUBMISSION OF JOINT PRETRIAL
ORDER
(SECOND REQUEST)**

Plaintiff Nathan Williams (“Williams”), and Defendant Allen et al, by and through his counsel Alina M. Shell and Jeffrey F. Barr of the law firm Armstrong Teasdale LLP and Defendant Harold Allen, by and through his counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, submit this Stipulation and Order to Extend the Deadline for Submission of Joint Pretrial Order currently due on July 11, 2023 for two weeks, up to and including July 25, 2023. This is the second request for an extension.

This stipulated request for an extension is made in good faith and not for the purposes of delay. The requested extension is necessary to allow the parties sufficient time to complete their respective parts of the joint pretrial order and to exchange drafts and confer as necessary to complete a joint pretrial order that both parties can agree to.

///

1 WHEREFORE the parties stipulate that the time for the parties to submit the joint pretrial order
2 be extended for 2 weeks, up to and including July 25, 2023

3 Dated this 10th day of July 2023.

Dated this 10th day of July 2023.

4 ARMSTRONG TEASDALE LLP

5 By: /s/ Douglas R. Rands

6 DOUGLAS R. RANDS, ESQ.
7 Nevada Attorney General
100 N. Carson Street
Carson City, Nevada 8701

8 *Attorneys for Defendant*

5 By: /s/ Alina M. Shell

6 ALINA M. SHELL, ESQ.
7 Nevada Bar No. 11711
JEFFREY F. BARR, ESQ.
Nevada Bar No. 7269
7160 Rafael Rivera Way, Suite 320
Las Vegas, Nevada 89113

8 *Attorneys for Plaintiff*

12 **IT IS SO ORDERED.**



13
14 RICHARD F. BOULWARE, II
15 UNITED STATES DISTRICT JUDGE

16 DATED this 12th day of July, 2023.

Allie Villarreal

From: Douglas R. Rands <DRands@ag.nv.gov>
Sent: Monday, July 10, 2023 11:40 AM
To: Allie Villarreal
Cc: Alina M. Shell; Roberta W. Bibee
Subject: RE: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

Looks good. You may file with my e-signature.

Doug

Douglas R Rands
Senior Deputy Attorney General
State of Nevada-Office of the Attorney General
Public Safety Division
100 North Carson Street
Carson City, NV 89701
775-684-1150
drands@ag.nv.gov

From: Allie Villarreal <AVillarreal@atllp.com>
Sent: Monday, July 10, 2023 11:37 AM
To: Douglas R. Rands <DRands@ag.nv.gov>
Cc: Alina M. Shell <AShell@Atllp.com>
Subject: RE: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning, Mr. Rands,

Please see the attached Stip. For your review and approval to affix your signature.

Thank you,
Allie.



Armstrong
Teasdale

Armstrong Teasdale LLP
Allie Villarreal | Legal Assistant /Assistant Office Manager
7160 Rafael Rivera Way, Suite 320, Las Vegas NV 89113
MAIN PHONE: 702.678.5070 | MAIN FAX: 702.878.9995
DIRECT: 702.415.2938 | Extension: 2938 | FAX: 702.878.9995 | CELL: 702.762.3286
AVillarreal@atllp.com

www.armstrongteasdale.com

Always exceed expectations through teamwork and excellent client service.

Please consider the environment before printing this email.

From: Douglas R. Rands <DRands@ag.nv.gov>
Sent: Monday, July 10, 2023 9:38 AM
To: Alina M. Shell <AShell@Atllp.com>
Cc: Roberta W. Bibee <rbibee@ag.nv.gov>; Allie Villarreal <AVillarreal@atllp.com>
Subject: RE: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

Works for me.

Send over a stip..

Doug

Douglas R Rands
Senior Deputy Attorney General
State of Nevada-Office of the Attorney General
Public Safety Division
100 North Carson Street
Carson City, NV 89701
775-684-1150
drands@ag.nv.gov

From: Alina M. Shell <AShell@Atllp.com>
Sent: Monday, July 10, 2023 9:36 AM
To: Douglas R. Rands <DRands@ag.nv.gov>
Cc: Roberta W. Bibee <rbibee@ag.nv.gov>; Allie Villarreal <AVillarreal@atllp.com>
Subject: RE: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning Doug:

I hate to ask for this, but would you be amenable to stippling the deadline for the JPTO currently due tomorrow (7/11) out an additional two weeks? I have been busy with other matters and haven't had enough time to dedicate to the JPTO.

Thank you in advance,

Alina



Armstrong Teasdale LLP
Alina Maria Shell | Of Counsel
MAIN PHONE: 702.678.5070 | MAIN FAX: 702.878.9995
DIRECT: 702.415.2933 | Extension: 2933 | FAX: 702.878.9995
ashell@atllp.com

www.armstrongteasdale.com

Always exceed expectations through teamwork and excellent client service.

Please consider the environment before printing this email.

From: Douglas R. Rands <DRands@ag.nv.gov>
Sent: Friday, June 9, 2023 10:46 AM
To: Allie Villarreal <AVillarreal@atllp.com>
Cc: Roberta W. Bibee <rbibee@ag.nv.gov>; Alina M. Shell <AShell@Atllp.com>
Subject: RE: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

Looks good to me.

You can add my e-sign.

Doug

Douglas R Rands
Senior Deputy Attorney General
State of Nevada-Office of the Attorney General
Public Safety Division
100 North Carson Street
Carson City, NV 89701
775-684-1150
drands@ag.nv.gov

From: Allie Villarreal <AVillarreal@atllp.com>
Sent: Friday, June 9, 2023 9:35 AM
To: Douglas R. Rands <DRands@ag.nv.gov>
Cc: Roberta W. Bibee <rbibee@ag.nv.gov>; Alina M. Shell <AShell@Atllp.com>
Subject: RE: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning, Doug,

I wanted to follow up with you on the draft stip. Please let us know if you have any edits or changes.

Thank you,
Allie.



Armstrong Teasdale LLP

Allie Villarreal | Legal Assistant /Assistant Office Manager

7160 Rafael Rivera Way, Suite 320, Las Vegas NV 89113

MAIN PHONE: 702.678.5070 | MAIN FAX: 702.878.9995

DIRECT: 702.415.2938 | Extension: 2938 | FAX: 702.878.9995 | CELL: 702.762.3286

AVillarreal@atllp.com

www.armstrongteasdale.com

Always exceed expectations through teamwork and excellent client service.

Please consider the environment before printing this email.

From: Alina M. Shell <AShell@Atllp.com>
Sent: Wednesday, June 7, 2023 2:44 PM
To: Douglas R. Rands <DRands@ag.nv.gov>
Cc: Allie Villarreal <AVillarreal@atllp.com>; Roberta W. Bibee <rbibee@ag.nv.gov>
Subject: RE: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

I am a little behind on getting you this, but here is a draft stipulation extending the deadline for the JPTO to July 11. Please let me know if you have any edits or changes.

Thank you,

Alina



Armstrong Teasdale LLP

Alina Maria Shell | Of Counsel

MAIN PHONE: 702.678.5070 | MAIN FAX: 702.878.9995
DIRECT: 702.415.2933 | Extension: 2933 | FAX: 702.878.9995
ashell@atllp.com

www.armstrongteasdale.com

Always exceed expectations through teamwork and excellent client service.

Please consider the environment before printing this email.

From: Alina M. Shell
Sent: Monday, June 5, 2023 4:02 PM
To: Douglas R. Rands <DRands@ag.nv.gov>
Cc: Allie Villarreal <AVillarreal@atllp.com>; Roberta W. Bibee <rbibee@ag.nv.gov>
Subject: RE: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

Thanks, Doug. We will get you a draft stipulation tomorrow.



Armstrong Teasdale LLP

Alina Maria Shell | Of Counsel

MAIN PHONE: 702.678.5070 | MAIN FAX: 702.878.9995
DIRECT: 702.415.2933 | Extension: 2933 | FAX: 702.878.9995
ashell@atllp.com

www.armstrongteasdale.com

Always exceed expectations through teamwork and excellent client service.

Please consider the environment before printing this email.

From: Douglas R. Rands <DRands@ag.nv.gov>
Sent: Monday, June 5, 2023 3:40 PM
To: Alina M. Shell <AShell@Atllp.com>
Cc: Allie Villarreal <AVillarreal@atllp.com>; Roberta W. Bibbee <rbibbee@ag.nv.gov>
Subject: RE: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

CAUTION: EXTERNAL EMAIL

Works for me...

Doug

Douglas R Rands
Senior Deputy Attorney General
State of Nevada-Office of the Attorney General
Public Safety Division
100 North Carson Street
Carson City, NV 89701
775-684-1150
drands@ag.nv.gov

From: Alina M. Shell <AShell@Atllp.com>
Sent: Monday, June 5, 2023 2:44 PM
To: Douglas R. Rands <DRands@ag.nv.gov>
Cc: Allie Villarreal <AVillarreal@atllp.com>; Roberta W. Bibbee <rbibbee@ag.nv.gov>
Subject: Williams v. Allen et al - joint pretrial order [IWOV-IDOCS.FID5011942]

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good afternoon Doug:

I hope all is well with you. I was looking at the calendar for this matter and noted that our joint pretrial order is currently due to the court on June 20. I am going to be out of the country June 8-17 (taking my overachieving child on her graduation trip) and have other matters pulling my attention right now, so I was wondering if you would be willing to stipulate to extending that deadline by 3 weeks – to July 11? I'd typically only ask for a 2-week extension, but since that would put us at July 4, I think kicking it out an additional week would be prudent.

Let me know if you're willing to kick out the due date and we can get a stipulation drafted.

Thank you!

Alina



Armstrong Teasdale LLP
Alina Maria Shell | Of Counsel